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*Attorneys for Kevin Washington and
CryptoWatt Management, LLC*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BUTTE DIVISION

KEVIN WASHINGTON, an individual
and minority owner of CryptoWatt
Investment Partners, LLC, the sole
member of CryptoWatt Mining, LLC,

vs.

Plaintiff,

MATTHEW BRENT GOETTSCHE,
an individual and majority owner of
CryptoWatt Investment Partners, LLC,
the sole member of CryptoWatt
Mining, LLC,

Defendant.

Cause No. CV 20-02-BU-BMM-KLD
Cause No. CV 20-03-BU-BMM

**MOTION FOR ORDER ALLOWING
PRODUCTION & USE OF
CONFIDENTIAL SETTLEMENT
AGREEMENT AND RELATED
DOCUMENTS IN AAA
ARBITRATION**

PLAINTIFFS, KEVIN WASHINGTON AND CRYPTOWATT MANAGEMENT, LLC, respectfully move this Honorable Court for an Order allowing them to produce a certain Confidential Global Settlement Agreement and General Mutual Release dated August 23, 2020 and related documents in response to jurisdictional discovery requests served on two of Washington's companies, Atlas Power, LLC and Atlas Power Holdings, LLC, AAA Arbitration Case No. 01-21-0002-5535 – *Evan Birenbaum v. CryptoWatt Management, LLC, et al.*

Rick Tabish and FX Solutions, Inc. were contacted, and they do not object to this motion. Matthew B. Goetsche, Hard Fork Holdings, Inc., CryptoWatt Investment Partners, LLC, and CryptoWatt Mining, LLC were also contacted, and they do object to this motion.

A Brief in Support is being filed contemporaneously herewith. Washington and CryptoWatt Management, LLC are also filing a separate Unopposed Motion to File the Settlement Agreement and Related Documents Under Seal so this Court can review and consider them in deciding the instant motion.

DATED this 18th day of November, 2021.

DATSOPoulos, MacDONALD & LIND, P.C.

By: /s/ J.R. Casillas

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Attorneys for Washington and

CryptoWatt Management, LLC

CERTIFICATE OF SERVICE

I, J.R. Casillas, one of the attorneys for Kevin Washington and CryptoWatt Management, LLC, hereby certify that a copy of the foregoing document was served on these persons by the following means:

1, 4 CM/ECF
 Hand Delivery
 Mail
 Overnight Delivery Service
 Fax
2, 3 Email

1. Clerk, U.S. District Court
2. Benjamin J. A. Sauter
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DATED this 18th day of November, 2021.

DATSOPoulos, MacDONALD & LIND, P.C.

By: /s/ J.R. Casillas
J.R. Casillas
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